

facilities available to all carriers at the same rates and on the same terms and conditions, in accordance with section 272(e)(4). Id. ¶¶ 42-43.

Joint Marketing Provisions of Section 272(g). As permitted by section 272(g)(2) and (g)(3), Pacific may market SBCS's services during both inbound and outbound calls. In its South Carolina Order, the Commission clarified the relationship between a BOC's joint marketing rights pursuant to section 272(g)(2) and its equal access obligations under section 251(g). The Commission concluded that a BOC may market its long-distance affiliate's service during inbound calls as long as it also "offers to read, in random order, the names and, if requested, the telephone numbers of all available interexchange carriers." South Carolina Order ¶ 239. When SBCS is authorized to offer long-distance service in California, it will conduct any joint marketing in a manner consistent with the FCC's decision. Yohe Aff. ¶ 46; Carrisalez Aff. ¶ 60. Moreover, to the extent SBCS avails itself of planning, design, and development activities provided by Pacific that are not themselves joint marketing, it will obtain assurance that those services are available to other entities on a nondiscriminatory basis pursuant to section 272(c)(1). Carrisalez Aff. ¶ 62.

Training and Internal Control Mechanisms. To ensure strict adherence to the requirements of section 272 by all employees, Pacific and SBCS have put in place extensive training programs, including live sessions, videotaped presentations, and written materials. Yohe Aff. ¶¶ 47-54 (describing SBC's and Pacific's compliance and training activities); Carrisalez Aff. Attach. H (SBCS compliance training policy). SBC distributes a section 272 compliance booklet to employees whose responsibilities require familiarity with section 272's requirements. See Yohe Aff. Attach. E (compliance booklet). Pacific has a centralized Affiliate Oversight

Group that is responsible for ensuring compliance with applicable state and federal accounting safeguards and has established intra-corporate reporting and review requirements to assist in accomplishing that function. Henrichs Aff. ¶¶ 44-48.

CONCLUSION

The Application should be granted.

Respectfully submitted,

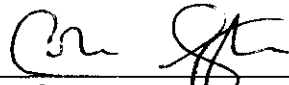
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September 20, 2002


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Services, Inc.*

REQUIRED STATEMENTS

Pursuant to the Commission's Public Notice, Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, DA 01-734 (FCC rel. Mar. 23, 2001), SBC states as follows:

- (a) pages i-ii of this Brief contain a table of contents;
- (b) the Executive Summary of this Brief contains a concise summary of the substantive arguments presented;
- (c) pages 10-13 of this Brief contain statements identifying how SBC meets the requirements of section 271(c)(1); the table of contents of Appendix B identifies the agreements on which SBC relies in this application; Attachment 3 to this Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 1-9 of this Brief contain a statement summarizing the status and findings of the California Public Utilities Commission's proceedings examining SBC's compliance with section 271;
- (e) this Brief contains the legal and factual arguments outlining how the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 14-82 address the requirements of section 271(d)(3)(A); pages 102-109 address the requirements of section 271(d)(3)(B); and 82-102 address the requirements of section 271(d)(3)(C);
- (f) Attachment 4 (separately bound) contains a list of all appendices (including affidavits) and the location of and subjects covered by each of those appendices;
- (g) inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by SBC in this Application should be addressed to:

Laura S. Brennan
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Sumner Square
1615 M Street, N.W., Suite 400
Washington, D.C. 20036-3209
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- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002 and certifications signed by officers or duly authorized employees certifying that all information supplied in this joint application is true and accurate to the best of their information and belief are included as Attachment 2 to this Brief;
- (i) Application materials and any subsequent submissions can be found at http://www.sbc.com/public_affairs/long_distance_news/california/0,5931,54,0.htm. This website is also identified on page 9 of this Brief.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

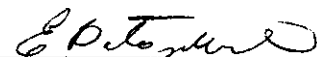
Application by SBC Communications Inc.,
Pacific Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in California

WC Docket No. _____

**DECLARATION AND VERIFICATION OF ENRICO R. BATONGBACAL
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF PACIFIC BELL TELEPHONE COMPANY**

1. I am the Executive Director-Regulatory of Pacific Bell Telephone Company ("Pacific"). I am authorized to make this declaration on behalf of Pacific.
2. I have reviewed the foregoing Application by SBC Communications Inc., Pacific Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in California, and the materials filed in support thereof ("Application").
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Pacific is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 12, 2002.



Enrico R. Batongbacal

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Application by SBC Communications Inc.,
Pacific Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in California

WC Docket No. _____

**DECLARATION AND VERIFICATION OF PAUL K. MANCINI
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF SBC COMMUNICATIONS INC.**

1. I am Vice President and Assistant General Counsel of SBC Telecommunications, Inc. I am authorized to make this declaration on behalf of SBC Communications Inc.
2. I have reviewed the foregoing Application by SBC Communications Inc., Pacific Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in California, and the materials filed in support thereof ("Application").
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Pacific is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct.

September 19, 2002.



Paul K. Mancini

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Application by SBC Communications Inc.,
Pacific Bell Telephone Company, and
Southwestern Bell Communications Services,
Inc. for Provision of In-Region, InterLATA
Services in California

WC Docket No. _____

**DECLARATION AND VERIFICATION OF JOE CARRISALEZ
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF SOUTHWESTERN BELL COMMUNICATIONS SERVICES**

1. I am Executive Director – Regulatory of Southwestern Bell Communications Services (“SBCS”). I am authorized to make this declaration on behalf of SBCS.
2. I have reviewed the foregoing Application by SBC Communications Inc., Pacific Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in California, and the materials filed in support thereof (“Application”).
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Pacific is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 16, 2002.


Joe Carrisalez

FEDERAL COURT CHALLENGES UNDER 47 U.S.C. § 252(e)(6)

The following cases represent the only ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements approved by the California Public Utilities Commission:

Order, AT&T Communications of California, Inc. v. Pacific Bell Tel. Co., No. C 01-02517 CW (N.D. Cal. Aug. 6, 2002), appeals pending, No. 02-16751 (9th Cir.), remand pending, Joint Application of AT&T Communications of California, Inc. (U 5002 C) and WorldCom, Inc. for the Commission to Reexamine the Recurring Costs and Prices of Unbundled Switching in Its First Annual Review of Unbundled Network Element Costs Pursuant to Ordering Paragraph 11 of D.99-11-050, A.01-02-024, et seq. (Cal. PUC)

Order, Verizon California, Inc. v. California Telecomms. Coalition, Nos. C 99-03973 CW, et seq. (Sept. 27, 2001), appeals pending, No. 01-17166 (9th Cir.)

Order, MCI WorldCom Communications, Inc. v. Pacific Bell Tel. Co., No. C-00-2171 VRW, 2002 WL 449662 (N.D. Cal. Mar. 15, 2002), remand pending, Petition of Pacific Bell for Arbitration of an Interconnection Agreement with MFS/WorldCom Pursuant to Section 252(b) of the Telecommunications Act of 1996, A.99-03-047 (Cal. PUC)